

**VIA CM/ECF**

September 24, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the  
Southern District of New York  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, No. 03 MDL 1570 (GBD)(SN)  
*Chairnoff v. Islamic Rep. of Iran*, No. 18-cv-12370 (GBD)(SN)  
*Burnett, et al. v. Islamic Rep. of Iran, et al.*, No. 15-cv-9903 (GBD)(SN)  
*Arias, et al. v. Islamic Rep. of Iran*, No. 19-cv-41 (GBD)(SN)

Dear Judge Netburn:

I write today together with counsel in the *Chairnoff* action and in response to the Court's Order dated September 19, 2021 addressing the claims of Elizabeth Parks. *See* ECF No. 7119. On June 8, 2021, I discussed with counsel in the *Chairnoff* case that Ms. Parks was already represented by Motley Rice in proceedings against Iran, and following that discussion, a Notice of Voluntary Dismissal was filed for Ms. Parks in the *Chairnoff* case that was signed by Judge Daniels on June 9, 2021. *See* ECF No. 6859. On September 13, 2021, counsel in the *Chairnoff* case filed a superfluous Rule 21 motion to dismiss Ms. Parks from that case in error. *See* ECF No. 7109.

The Court's September 19, 2021 Order raised an issue of which undersigned counsel was unaware. Ms. Parks is a plaintiff in the *Arias* case (where undersigned counsel is also counsel of record); however, the judgment obtained for Ms. Parks was sought and entered in the *Burnett* case due to a clerical error. As a result of this determination, counsel for the *Arias* and *Burnett* plaintiffs shall file a motion to modify the judgment awarding solatium damages to Ms. Parks to reflect that this judgment is entered in the *Arias* case and not the *Burnett* case. Counsel apologizes for the confusion that this has caused and hope to rectify these issues without delay.

Respectfully submitted,



John M. Eubanks